

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

vs.

Criminal No. 04-30032-MAP

FRANK KEOUGH, et al.,
Defendants

**DEFENDANT, FRANK KEOUGH'S, MOTION TO SELF REPORT TO FEDERAL
FACILITY**

Now comes the Defendant, Francis Keough, in the above-captioned matter, and respectfully requests this Honorable Court to allow him to self- report to the federal facility he has been designated to serve his sentence in.

The defendant has been informed by the U.S. Marshall Service that he has been designated to serve his sentence at FCI Schuylkill in Minersville, PA. The defendant has also been informed that he is due to begin transport to that facility on Monday June 11, 2007. The defendant is currently incarcerated at the Hampshire County House of Correction, and will be transported to that facility by the U.S. Marshall Service.

The defendant is requesting this court allow the defendant to be released, subject to any conditions the court shall deem fit, on Friday June 8, 2007 to his home on Sumner Avenue in Springfield, MA, with an order to report to his designated facility on Monday June 11, 2007. In addition to saving the government the costs and expenses related to moving the defendant, this order by the Court will allow the defendant to deal with any and familial issues that the defendant may not be able to deal with while he incarcerated several hundred miles away from

his family. The Court is aware of certain special familial conditions that exist for this defendant from his sentencing hearing.

The defendant states that he was incarcerated pending trial in this matter only after being released and then violating certain pretrial conditions that he not contact any witnesses in this matter. As a practical matter, since the defendant has plead guilty in this case, and any such contact would now be moot. In addition to which, the defendant would absolutely agree to no contact with any individual involved in his case, and any other order this Court deems fit.

The defendant states the Court has this authority pursuant to 18 U.S.C.A. § 3143(a), which pertains to “release or detention of a defendant *pending sentence*” (italics added)

THE DEFENDANT,
FRANK KEOUGH

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CERTIFICATE OF SERVICE

I, Dan Kelly, Esq., hereby certify that I caused the foregoing document to be served upon the United States Attorney's Office at 1500 Main Street, Springfield, MA, by in hand service this 18 day of May, 2007.

/s/Daniel D. Kelly
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